

In the US District Court for the State of Oregon

Benjamin Jay Barber

v.

Unitus Community Credit Union,
Rebecca Rich, in her official capacity
as branch manager for Unitus
Unknown John Doe, in his official capacity as
bank teller for Unitus

Case No. 3:22-cv-00134-MO

Second Motion to Amend the Complaint.

Plaintiff submits this second motion to amend the complaint, and the attached proposed amended complaint.

The differences between the previous proposed amended and the second proposed amended complaint is as follows:

1. Newly discovered evidence with regards to a recent conference attended by the CEO of Unitus and the CEO of Inclusiv to the NCUA ACCESS conference, which occurred between November 2nd and November 4th
2. Fixed a hyperlink in the footnote 20 and 22 from
<https://www.unitusccu.com/join-unitus/>
to
<https://www.unitusccu.com/diversity-equity-and-inclusion/>
3. Added a reference to 12 CFR Appendix A to Part 749 - Record Retention Guidelines, to demonstrate that defendant Rebecca Rich most likely lied about not having company records to verify the plaintiff's identity using his previous Unitus Statements in both his and their possession.

Date Nov 30, 2022

/s/Benjamin Barber



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Certificate of Service

On November 30th the plaintiff sent a copy of this motion to amend the complaint to the defendant by US mail first Class



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A handwritten signature in black ink, appearing to read "Ben Barber". The signature is fluid and cursive, with "Ben" on top and "Barber" below it.